

1 JEFFREY B. SETNESS, ESQ.
2 Nevada Bar No. 2820
3 FABIAN VANCOTT
4 411 East Bonneville Avenue, Suite 400
5 Las Vegas, Nevada 89101
6 Telephone: (702) 333-4900
7 Facsimile: (877) 898-1168
8 E-Mail: jsetness@fabianvancott.com
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10 *Attorneys for Defendants LASR Clinics Summerlin,
11 LLC, Israel Villasenor, and Brian Rogers*

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LASR CLINIC OF SUMMERLIN, LLC;
ISRAEL VILLASENOR; AND BRIAN
ROGERS;

Defendants.

CASE NO. 2:19-cv-00467-GMN-NJK

STIPULATION TO EXTEND TIME TO
FILE ANSWER AND/OR RESPONSIVE
PLEADING TO COMPLAINT AND
~~PROPOSED ORDER~~

IT IS HEREBY STIPULATED AND AGREED, by and between NICHOLAS A. TRUTANICH, United States Attorney, and ROGER W. WENTHE, Assistant United States Attorney, counsel for the United States of America, and JEFFREY B. SETNESS of the law firm of Fabian VanCott, counsel for LASR CLINIC OF SUMMERLIN, LLC, ISRAEL VILLASENOR, AND BRIAN ROGERS that the period of time in which defendants LASR CLINIC OF SUMMERLIN, LLC, ISRAEL VILLASENOR, AND BRIAN ROGERS may file an answer and/or other responsive pleading to the Complaint is extended from Monday, May 20, 2019 to Thursday, June 20, 2019.

The Stipulation is entered into for the following reasons:

1. On December 28, 2018, LASR Clinic of Summerlin, LLC filed a Voluntary Petition for Non-Individuals Filing for Bankruptcy.

1 2. On March 1, 2019, Israel Villasenor filed a Voluntary Petition for Individuals
2 Filing for Bankruptcy.

3 3. On March 19, 2019, the United States filed a Complaint in the case of *United*
4 *States of America v. LASR Clinic of Summerlin LLC; Israel Villasenor; and Brian Rogers*,
5 Case No. 2:19-cv-00467-GMN-NJK naming LASR Clinic of Summerlin, LLC, Israel
6 Villasenor, and Brian Rogers as defendants. (Doc. No. 1)

7 4. On March 19, 2019, the Complaint and related documents was sent to the
8 undersigned AUSA Wenthe.

9 5. On April 3, 2019, the undersigned on behalf of defendants LASR Clinic of
10 Summerlin, LLC, Israel Villasenor, and Brian Rogers signed Waiver of the Service of
11 Summons forms and transmitted them to the AUSA Wenthe which states, in pertinent part,
12 that "I also understand that I, or the entity I represent, must file and serve an answer or a
13 motion under Rule 12 within 60 days from March 19, 2019, . . .".

14 6. Based upon the calculations of the undersigned, 60 days from March 19, 2019
15 is Saturday, May 18, 2019 and the next business day is Monday, May 20, 2019. Therefore, an
16 answer or responsive pleading to the above-mentioned Complaint must be filed no later than
17 Monday, May 20, 2019.

18 7. It is anticipated that defendant Brian Rogers will be filing a Voluntary Petition
19 for Individuals Filing for Bankruptcy within the next week or so.

20 8. The parties have been engaging in settlement negotiations to resolve this
21 litigation and it is hoped that a Settlement Agreement can be reached shortly.

22 **DATED this 13th day of May 2019.**

23 **NICHOLAS A. TRUTANICH**
24 **United States Attorney**

FABIAN VANCOTT

25 **By: /s/ Roger W. Wenthe**
26 **ROGER W. WENTHE**
27 **Assistant United States Attorney**
Attorneys for United States

By: /s/ Jeffrey B. Setness
JEFFREY B. SETNESS, ESQ.
Attorneys for Defendants LASR Clinics Summerlin,
LLC, Israel Villasenor, and Brian Rogers

ORDER

Based upon the Stipulation of the parties and good cause appearing, IT IS ORDERED that the period of time in which defendants LASR CLINIC OF SUMMERLIN, LLC, ISRAEL VILLASENOR, AND BRIAN ROGERS may file an answer and/or other responsive pleading to the Complaint is extended from Monday, May 20, 2019 to Thursday, June 20, 2019.

May 14, 2019

DATE

**NANCY J. KOPRE
UNITED STATES MAGISTRATE JUDGE**